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May, 13 2014



## VIA ECF AND ELECTRONIC MAIL

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
The Hon. Charles L. Brieante Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, New York 10601-4150

Re: The Wave Studio, LLC v. General Hotel Management Ltd., et al., No. 13 CV 9239 (CS) (PED)

Dear Judge Seibel:

I write on behalf of American Airlines, Inc. ("American") in the above-captioned case to request an extension of time pursuant to Rule 1.E. of Your Honor's Individual Practice. Specifically, American requests an extension of time from May 20, 2014 until June 12, 2014 to answer or otherwise respond to the Complaint. American is requesting this extension in order to have sufficient time to gather information regarding the allegations against them and prepare a response. No prior extensions have been requested in this case by American. Plaintiff has consented to this extension.

Enclosed is a copy of the Stipulation and Order to Extend Time to Answer or Otherwise Respond to Complaint, which has been executed by counsel for Plaintiff and counsel for American.

Respectfully submitted,

Dawn M. David

cc: William H. Frankel, Esq. Cameron Reuber, Esq.

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE WAVE STUDIO, LLC,

Plaintiff,

Civil Action No. 13 CV 9239 (CS) (PED)

v.

GENERAL HOTEL MANAGEMENT LTD., ET AL.

Defendants.

STIPULATION AND ORDER TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT

## STIPULATION AND ORDER TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT

Plaintiff The Wave Studio, LLC ("Plaintiff") and Defendant American Airlines, Inc. ("Defendant") hereby file this Stipulation and Order extending Defendant's time to answer, respond to, or otherwise move against Plaintiff's Complaint as follows:

WHEREAS, Plaintiff filed its Amended Complaint in this Action on April 23, 2014.

WHEREAS, Plaintiff served Defendant on April 28, 2014 and Defendant's deadline to respond to the Complaint is May 20, 2013;

WHEREAS, Plaintiff and Defendant agree to stipulate to an extension of time from May 20, 2014 to June 12, 2014, for Defendant to interpose an answer, move or otherwise plead in this action;

WHEREAS, this constitutes the first such extension of Defendant's time to respond.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiff and Defendant, subject to the approval of the Court, that the time for Defendant to answer, respond, or otherwise move against the Complaint in this action shall be extended from May 20, 2014, until and including June 12, 2014.

Respectfully submitted,

Dated: May 15, 2014 BRINKS GILSON & LIONE

By: /s/ William H. Frankel

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PRO HAC VICE

Attorneys for Defendant American Airlines, Inc.

Dated: May 15, 2014 LEASON ELLIS

By: <u>/s/ Cameron Reuber</u>

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Attorney for Plaintiff The Wave Studio LLC.